



Melissa Brown  
+1 212.836.7981 Direct  
Melissa.Brown@arnoldporter.com

March 30, 2022

**VIA ECF**

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re:   *American GreenFuels Rockwood (Tennessee), LLC v.  
Aik Chuan Construction Pte. Ltd*, No. 21-CV-7680(VB)**

Dear Judge Broderick:

We represent Defendant/Counterclaim Plaintiff Aik Chuan Construction Pte. Ltd. (“Aik Chuan”) in the above-captioned matter. Pursuant to Rule 1(G) of Your Honor’s Individual Rules, we write to request an extension of time up to and including April 22, 2022 to file an Amended Counterclaim Complaint pursuant to Federal Rule of Civil Procedure 15(a)(1)(B).

On March 21, 2022, American GreenFuels Rockwood (Tennessee), LLC (“AGF”) and Kolmar Americas, Inc. (“Kolmar” and together with AGF, “Counterclaim Defendants”) filed their motions to dismiss Aik Chuan’s Counterclaim Complaint. (ECF Nos. 20–24.) On March 23, 2022, Your Honor issued an Order, setting April 11, 2022 as the date for Aik Chuan to file an Amended Counterclaim Complaint pursuant to Federal Rule of Civil Procedure 15(a)(1)(B); and if no Amended Counterclaim is filed, setting April 20, 2022 as the date for Aik Chuan to file an opposition to Counterclaim Defendants’ motions to dismiss. (ECF No. 25.)

Aik Chuan intends to file an Amended Counterclaim Complaint and respectfully requests additional time to analyze and properly respond to the arguments raised in Counterclaim Defendants’ motions to dismiss in an effort to limit the factual and legal issues that may come before the Court for consideration. In order to avoid the holidays, Aik Chuan requested and received from AGF an extension to answer or otherwise respond

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The Honorable Vernon S. Broderick  
March 30, 2022  
Page 2

to AGF's Complaint in this matter. Aik Chuan has not otherwise requested an extension of time in this matter. This request does not affect any other scheduled dates. We have conferred with counsel for Counterclaim Defendants who indicated that they neither consent to, nor oppose this request. Counsel's stated reason for not consenting to this request is that the Court has already established the deadline for Aik Chuan to file an amended complaint.


Accordingly, Aik Chuan respectfully requests an extension of time to and including April 22, 2022 to amend its Counterclaim Complaint pursuant to Rule 15(a)(1)(B).

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Melissa Brown  
Melissa Brown

cc: Counsel for Plaintiff/Counterclaim Defendants (*via ECF*)

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 4/1/2022